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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:20-cr-00463-HZ

Plaintiff,

**DECLARATION OF
RYAN COSTELLO IN SUPPORT OF
UNOPPOSED MOTION TO CONTINUE
TRIAL DATE**

v.

PEDRO ALDO RAMOS, JR.,

Defendant.

I, Ryan Costello, declare:

1. I am the attorney appointed to represent Pedro Aldo Ramos, Jr. in the above-entitled case.
2. A jury trial in this case is currently scheduled for April 6, 2021. Mr. Ramos was arraigned on the indictment on October 8, 2020. This is the second continuance sought by the defense.
3. Mr. Ramos is currently on release and in compliance with the conditions thereof.

4. Mr. Ramos and the government reached a written deferred prosecution agreement. Per the agreement, Mr. Ramos respectfully requests that this Court continue the trial until April 18, 2022, or a date thereafter convenient to the Court to allow Mr. Ramos sufficient time to complete the written deferred prosecution agreement's requirements.

5. I have discussed Mr. Ramos's right to a speedy trial with him. Mr. Ramos agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(2) of the Speedy Trial Act. Assistant United States Attorney Thomas Ratcliffe has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on March 10, 2021, in Portland, Oregon.

/s/ Ryan Costello

Ryan Costello
Assistant Federal Public Defender